

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

The State of Texas, *et. al.*,

Plaintiffs,

v.

Google LLC,

Defendant.

Case No. 4:20-CV-957-SDJ

Hon. Sean D. Jordan

PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff State of Texas respectfully requests leave to file under seal unredacted versions of its Response in Opposition to Google's 1404(a) Motion to Transfer Venue and the Declaration of Brooke Smith in support thereof (Dkt. 46), which contained three redactions relating to information that the Court has already ordered to remain sealed. (Dkt. 48.)

Specifically, on February 3, 2021, the Court granted Plaintiffs' motion to file several declarations and documents under seal to protect confidential third-party and Google information. (Dkt. 48.) One of those documents, Exhibit B-3, was designated highly confidential by Google. In order to maintain the confidentiality of the information contained within that document, Plaintiffs also redacted three references to that document from their Response in Opposition to Google's 1404(a) Motion to Transfer Venue and the Declaration of Brooke Smith. (Dkt. 46.) Plaintiff therefore respectfully requests leave to file the unredacted versions of the Opposition and Declaration under seal.

Dated: February 5, 2021

Respectfully Submitted,

/s/ Ashley Keller

Ashley Keller

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7(h), I certify that Zeke DeRose, counsel for the State of Texas, conferred by teleconference about the subject of this Motion with Paul Yetter, counsel for Google, on January 29, 2021, and February 1, 2021. On February 1, 2021 Mr. Yetter confirmed by email that Google did not oppose the filing under seal of confidential materials related to Plaintiffs' opposition, and on February 4, 2021, Bryce Callahan confirmed that Google does not oppose the filing under seal of the unredacted versions of plaintiffs' opposition brief and Ms. Smith's declaration.

/s/ Ashley Keller
Ashley Keller

CERTIFICATE OF SERVICE

I certify that on February 5, 2021, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Ashley Keller
Ashley Keller